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ST. MARY'S CATHOLIC SCHOOL

January 14, 2005



Lisa S. Gelb
Deputy Chief
Wireline Competition Bureau
Federal Communications Commission
Washington, D.C. 20054

Dear Ms. Gelb:

Thank you very much for the opportunity to respond to the General Memorandum dated September 1, 2004 and the Draft report on Audit of the E-Rate Program at St. Mary's Catholic School, St. Croix, U.S. Virgin Islands for year 2000. I'm writing to appeal for reconsideration of the findings and recovery amount recommendation.

In my February 4th letter I agreed with the report's findings; however, key to that report was the absence of documents St. Mary's should have maintained and had available for the auditors. Both the auditor and I simply could not reach any other conclusion without more information. After I received the draft audit December 9, 2004, St. Mary's staff began reconstructing our files. Although we were not able to locate all of the missing records and resolve all issues, we were able to substantially reconstruct our files that now support more favorable conclusions and recommendations. Enclosed for your review is our support for reconsideration of the Results of Review section of the report.

Returning all of the money would close St. Mary's School and devastate the educational advancement of our children. In the face of an unaccredited, under-funded yet overcrowded public school system, many of our parents choose St. Mary's and sacrifice to pay tuition so that their children can receive the well rounded education crucial to their future, as you can see from the enclosed alumnae letters (see enclosures 1-3). We are the most affordable accredited alternative parents have as other private schools' tuitions run $5,000 more than ours and are out of our parents' reach. Furthermore, many of our families simply cannot afford to have a computer and the Internet in their homes and would otherwise miss out on the opportunities presented by the information age being at their fingertips. Closing St. Mary's would send 234 children back into a downward spiraling public school system, expand the digital divide and substantially change their future for the worse. We can't afford to have that happen.

If you have any questions, please contact me or Jon Mahony of my staff at the numbers listed below.

Sincerely,

Mrs. Elizabeth Hering
Administrator St. Mary's School

St. Mary's Catholic School is a parishioner-supported mission of Holy Cross Catholic Church located in Christiansted, St. Croix, U.S. Virgin Islands, that has been providing academic programs for over a century. Founded in 1898, St. Mary's offers academic programs for approximately 234 students in pre-kindergarten through eighth grades. The School is accredited by the Middle States Association of Colleges and Schools and the Virgin Islands Government. The Redemptorist Fathers started the school as a mission of Holy Cross Catholic Church to provide a quality affordable education to the children of St. Croix. Through small class size, family orientation, and a strong back-to-basics approach to education, we develop the whole child, promote academic excellence, and live out the gospel message of Jesus. As a result, our students leave St. Mary's with a solid foundation in academics, highly motivated to continue their learning, and with a strong grounding in Catholic principles and values.

St. Mary's technology program was very modest prior to 2000 consisting of approximately 25 standalone computers. Max Mizejewski of Computers, Networks and Accounting was hired by St. Mary's as a consultant to manage the E-rate program. He was paid by St. Mary's to post on the USAC website our completed FCC Form 470, work with St. Mary's staff to develop the USAC technology plan and obtain approval for the plan, develop a comprehensive request for proposal, and file FCC form 471 and FCC form 486 (see enclosure 4). On behalf of St. Mary's, he submitted FCC Form 471 on Jan 15, 2000. In April 2000, we received a funding commitment of eighty percent. We submitted an appeal for ninety percent funding commitment in May 2000 and that appeal was granted on May 21, 2001. The installation of two Dell Power Edge Servers, internal connections and Internet connection hardware was completed in the summer of 2001.

To support the network installation, a teacher, with a salary of $20,000 ($4, 000 to $6,000 more than any other teacher) was hired (see enclosure 8). He was responsible for technology coordination/computer network administration and teaching computer applications for school years 2001-2002 and 2002-2003. For school years 2003-2004 and 2004-2005, the technology coordinator/network administrator position was filled by a volunteer and a teacher was hired to teach computer classes only at a salary of $8000 and $8400 per year respectively. Beginning in the winter of 2002, the network grew from 25 computers and two servers to 100 networked computers and three servers.

## From Results of Review section of the draft audit

***Technology Plan***

**Lack of Proper Approval**

In April 2000, St. Mary's Technology plan (see enclosure 5) was submitted to the Caribbean Association of Independent Schools (CAIS) and Caribbean Computer Users in Education Organization (CCUE). Both CAIS and CCUE are certified approval agencies (see enclosure 6). The plan was approved by CCUE June 2, 2000.

**Overall plan deficiencies**

Although the approved 2000 technology plan was adequate initially, St. Mary's technological needs have changed. We have reassessed our technology needs, updated our plan and resubmitted our plan to CCUE. I have included a signed, dated copy of the plan(see enclosure 7). For specifics please refer to the plan, however, in general:

- The plan goals are specific and include strategies for using technology to improve our students education and teacher's professional development. It includes guidelines for integrating technology into the education process.
- The plan includes how to increase computer skills of students and teachers. The plan outlines how technology will be used to enhance the core curriculums and the teacher's use requirements. It also outlines how technology will be used to meet individual student development.
- The plan requires periodic comprehensive school needs assessments and forecasts in detail the hardware, software, and budgeting process needed to maintain and grow the network over the next three school years.
- The plan outlines the budget process and need requirements necessary to sustain the network. It also cites multiple alternative funding sources.
- The plan no longer depends on a technology team. It includes a progress schedule with expected outcomes and deadlines for students and teachers competencies and network usage. The budget process is adjusted or reprogrammed based on daily work requests, weekly requisitions for technology support and is offset by monthly donations of hardware, software and funds earmarked for technology, and results of periodic meetings with the technology coordinator/network administrator, principal, business manager and Pastor as needed.

**E-Rate Program Funding Not Budgeted or Approved**

As a mission of Holy Cross Catholic Church, the school's financial matters are handled by the parish Pastor and business manager. Prior to the audit, there was no line item for technology in St. Mary's School budget. As shown in the technology expense history (see enclosure 8[1]) monies were spent on technology.

| ***Year*** | ***Expense*** |
|---|---|
| 2004-present | $10,552.58 |
| 2003-2004 | $25,325.90 |
| 2002-2003 | $30,754.26 |
| 2001-2002 | $27,344.07 |
| 2000-2001 | $12,167.32 |
| ***Total*** | ***$106.143.32*** |

St. Mary's Technology expense history. Cost for 2003-2004 and 2004-2005 are lower because the technology coordinator and network administrator position was filled by a volunteer.

While we did not have a budget line item, our requests and invoices were funded by St. Mary's accounts that were managed by the Pastor and Holy Cross Catholic Church Business Manager. No purchase requests were denied. Following receipt of the draft audit, Holy Cross Catholic Church Parish has added a technology line item to the St. Mary's School budget. The resubmitted technology plan (see enclosure 7) includes time tables and a funding source overview.

St. Mary's began the acquisition of donated computers by developing business partnerships with the United States Coast Guard Partnership in Education Program, Hovensa Refinery, and parishioners of Holy Cross Church. By April of 2002, St. Mary's had acquired enough computers to fill all available workstations. We have an adequate number of spare computers and have even donated some of the computers to

[1]Not to all

needy students. We have had multiple hardrives, monitors, printers, power supplies and scanners in assorted conditions donated each year. Additionally, we have purchased or received donations of necessary software utilities, applications and operating systems (see enclosure 10). The school budgeted $46,000 for and acquired three major educational programs within the last two years: Accelerated Reading, AutoSkill Reading, and AutoSkill Math. These are researched based diagnostic/prescriptive programs to both remediate and advance reading and math skills. Budgeted into these acquisitions were a week of training from specialists in use of AutoSkill from the company headquarters in Canada. We receive phone assistance from the company as needed and continued online support. A part time teacher has been hired at $8,000 per year to run the Accelerated Reading program on site and to assist teachers in use and reporting of the program. The AutoSkill Programs were implemented in August 2002 and the Accelerated Reading program was implemented in January 2004.

**Lack of Support for payment of non-discounted portion of contracted services**

All the E-rate bills were handled by the consultant and the contractor. We were not billed. We contacted Dell and have and our account is now current. According to Christina Courtney of Dell Marketing, the unpaid posted amounts were $3584.45 for St. Mary's and $3748.10 for SLD. We have paid the entire amount of $7332.55 (See enclosure 11). We have been unsuccessful in contacting Lindsey Electronics, Inc. to document payment or non-payment of the non-discounted portion of the construction and installation of the LAN backbone cabling and the wiring of the routers/hubs and drops to connect the School's rooms to the MDF. We will continue our attempts to locate him. Our account with Choice Communications is current (see enclosure 8).

**Competitive Award Process Not Documented**

St. Mary's completed FCC Form 470 was posted on the Internet and we waited 28 days before entering into a contract. However, we only received bids from L.E.I., who was awarded the contract, and a higher bid from Bizco (see enclosure 12). We interpret and believe the rules do not require us to seek out price quotes from multiple sources if no service provider responds to a Form 470 posting.[2]

**Record Keeping Inadequate.**

Prior to receipt of this audit, upon becoming principal one and a half years ago, I noted record keeping deficiencies campus wide and directed and instituted adoption of an efficient filing system. Poor record keeping has not resulted in an uneconomical use of E-rate resources.

We have acquired desktop computers from corporations, government programs and individuals faster than we expected. We have acquired operating systems, utilities and applications (see enclosure 10) from a variety of sources. Since its installation in 2001, our network has grown from 25 computers to approximately 100 computers. Our computers are donated and often times donors wish to remain anonymous. They are refurbished and repaired in house by volunteers. We use no or low cost open source operating systems, applications and utilities wherever possible. This lends itself to poor accountability. I have directed that all donations (whether anonymous or not) be recorded and routed through the business manager.

[2]See request for Review of the Decision of the Universal Service Administrator by Winston-Salem County School District, CC Docket Nos. 96-45 and 97-21, Order, 18 FCC Rcd 26457, 26462 (2003) ("our rules require applicants to seek competitive bids; they do not require an applicant to have competing bidder where none appear")

As the auditors saw during their site visit, our network is up and running. For your review, we have posted pictures at link www.holycrosscatholicchurch.org/School_pictures/photo_index.htm on our website at www.holycrosscatholicchurch.org/school/school_history.htm to provide performance based documentation that our network remains a function educational tool.

The E-rate Program at St. Mary's has been a spectacular success. Despite the record keeping and management shortfalls, the programs end goals were met. 100 percent of our classrooms are connected to the Internet and our students have the opportunity presented by the information age at their fingertips. Without this necessary hardware, many of our children would not have any access to the Internet for research and skills development.

St. Mary's is dedicated to having all workstations operational with updated versions of all educational software programs, operating systems, and utilities. This is essential to ensure we are utilizing the network for the educational advancement of our children. In order for this to happen, the principal, technology coordinator/network administrator, and computer teacher evaluate daily, verbal and written requests for network assistance, maintenance needs and virus and security protection upgrades. The principal and technology coordinator/network administrator then prioritize requests from students, teachers, staff, and parents. The network has been up and running continuously since its installation in 2001.

Computer applications are evaluated and are funded by St. Mary's, Title V, Holy Cross Catholic Church and donors. St. Mary's has purchased several key programs to enhance the educational opportunities of our teachers and students. They are as follows:

- Gradequick: This program is a located on the school server (see enclosure St. Mary's Computer Network Overview) and can be accessed from any workstation on campus. The grade files that are created are edited and stored on the server. Having this computer program allows for more instructional time as teachers are freed from some of their clerical work.

- Accelerated Reader: The Accelerated Reading Program is located on the server and presently can be accessed only in the computer lab. Future access from the library is planned. This allows monitoring of test taking and centralization of record keeping. This program is an incentive based program in which 2nd through 8th grade students participate. It diagnoses individual student reading levels and dictates a comfort zone in which the children should read. The library books are color coded to the reading levels. When a student finishes a book s/he takes a quiz and earns points based in the difficulty of the book to spend on auction prizes. This incentive program encourages students to read.

- Autoskill Reading/Math: These programs are located on the server and can be accessed from any workstation on campus. This program is a prescriptive and diagnostic learning tool. It diagnosis skills levels and takes each student through an individualized series of activities. Presently, students identified with learning disabilities are utilizing this program. It is to be expanded to gifted and talented students.

- Kidspiration: This program is located on individual computers throughout the campus. This program walks students through the writing process beginning with mapping/webbing, organizing, writing, editing, and final draft. Students use it to create stories and other projects assigned by the teacher.

- Typing tutor: This program is used from the disk. It is a program geared toward Kindergarten - 3rd grade. It teaches basic typing skills to prevent students from developing poor typing habits that dramatically effect productivity.

- Jumpstart Kindergarten through 6th grade: These programs are used from the disk. They address reading, math, and logic skills at age appropriate levels. These programs are used as fun ways to learn skills.

- The Incredible Machine: This program is located on individual computers and is a problem solving program. It is geared to 2nd through 8th graders.

- Library World Silver: This program is located on the server and can be accessed from any computer on campus. It is presently accessed only by the librarian as books are scanned for check out and in. It tracks students and the books they have out of the library. It is to be expanded for use by the students on three computers to do catalog searches.

- Traditional Office Suite Applications: These applications are located on each individual computer. They are used by both students and teachers for a myriad of projects and purposes.

St. Mary's understands that staff training is an integral part of the software's success. As examples, with the purchase of the AutoSkill programs our teachers received three full days of training from the company representatives. The school also did follow up with group and individual training by the principal and two key teachers. A half day in-service program was required upon the implementation of the Accelerated Reading Program. There have been three subsequent needs checks over the course of 2004 - 2005. We also hired a specific Accelerated Reading teacher to assure proper use of the program and its development. Teachers receive one full day of Gradequick training each August during the teacher development days before school opens. There is also continued assistance from the principal and key teachers throughout the year.

Teachers are expected to adapt curriculum guidelines for students with special needs by integrating the use of the remedial or accelerated programs. The principal, teacher, school psychologist, parents, and student meet to discuss the student's individual learning needs and the role these educational programs have in the students remediation or acceleration. Students have even had Autoskill loaded on their home computers for use after school and over the summer.

Teachers are expected to use technology in all core subject areas and work in conjunction with the computer teacher for completion of projects. Students are expected to use the Internet, word processing, graphics, power point, and other programs to develop research papers, web field trips, projects, and other assignments. Teachers are

expected to use technology for record keeping, evaluation of student work, development of lesson plans, and communication with the administration and parents.

In closing, St. Mary's is committed to the integration and effective use of current and future technology to further our educational mission of developing the whole child, promoting academic excellence, and evincing the gospel message of Jesus Christ. Central to this commitment has been St. Mary's dedication over the last 5 years to staff training, hardware and software acquisitions, and review of feedback from teacher, parents, and students.

That being said, how has E-rate funding made a difference, how do we measure success or failure? We measure with our students performance and here is what we have seen. Upon implementing Accelerated Reading in January 2004 we tested every child in the school using the STAR program. By May, every child in the school had improved, some as much as 8 months in their reading levels, 3 months beyond what would have been expected without its use.

Our students who have participated in the Autoskill reading program have all increased their reading levels, some as much as a full year's growth. Those students using AutoSkill math have been able to learn basic math facts which prevented them from accurately completing more difficult problems. None of this would have been possible without a functioning network.

Our student's growth would have been stunted and their opportunities limited but thankfully we have been able to put their hands on technology that will help them excel.